

July 19, 2023

**VIA ECF**

Hon. Jennifer E. Willis, U.S.M.J.  
United States District Court for the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 228  
New York, New York 10007

RE: *U.S. Bank National Association, as Trustee for GSAMP Trust 2007-HE1 v. Goldman Sachs Mortgage Company & GS Mortgage Securities Corp.* (No. 1:19-cv-02305) [rel. 1:19-cv-02307]

*U.S. Bank National Association, as Trustee for GSAMP Trust 2007-HE2 v. Goldman Sachs Mortgage Company & GS Mortgage Securities Corp.* (No. 1:19-cv-02307) [rel. 1:19-cv-02305] (collectively, the “Actions”)

Dear Judge Willis:

We write jointly on behalf of the Plaintiff-Trustee and Defendants in these residential mortgage backed securities (“RMBS”) actions to respectfully request an extension of the June 26, 2023 deadline to serve requests to admit set forth in this Court’s May 6, 2022 Amended Civil Case Management Plan and Scheduling Order (1:19-cv-02305, Dkt. 152 & 1:19-cv-02307, Dkt. 126), previously extended until July 24, 2023 per the Court’s Order of April 13, 2023 (1:19-cv-02305, Dkt. 171 & 1:19-cv-02307, Dkt. 143). This is the parties’ first joint request to extend the deadlines to serve requests to admit. This request complies with Rule 1.C of this Court’s Individual Practices.

The parties request an extension of the deadline to serve requests to admit because the parties believe an extension is necessary to allow the Plaintiff-Trustee and Defendants to formulate and issue productive and efficient requests.

Accordingly, the parties respectfully request that the deadline to serve requests to admit be extended to 30 days after the conclusion of expert depositions.

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We appreciate Your Honor's consideration of this request. The parties are available at the Court's convenience to discuss this matter further, if necessary.

Respectfully submitted,

/s/ Christopher P. Johnson

Christopher P. Johnson

*Counsel for Plaintiff-Trustee*

/s/ Richard A. Jacobsen

Richard A. Jacobsen

*Counsel for Defendants*